



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

APR - 6 2004

400 Seventh St., S.W.
Washington, D.C. 20590

Mr. Ronald J. Stokes
ExxonMobil Chemical Company
Intermediates, Synthetics Product Stewardship
P.O. Box 3140
Edison, New Jersey 08818

Ref. No. 04-0039

Dear Mr. Stokes:

This responds to your March 1, 2004 letter, requesting clarification on marking requirements for bulk packagings under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if the technical name is required as part of the marking on bulk packagings, such as portable tanks in intermodal movement from highway or rail to vessel.

Sections 172.326, 172.328, and 172.330 generally require bulk packagings, such as portable tanks, cargo tanks and tank cars, to be marked with the shipping name or appropriate common name, and UN identification number. The HMR do not require the technical name to be marked on bulk packagings. However, if you choose to do so, it is permissible.

The International Maritime Dangerous Goods (IMDG) Code Special Provision 274 states that, "for the purposes of documentation and package marking, the proper shipping name shall be supplemented with the technical name" (see 3.1.2.8.1). Therefore, for those materials that are required to comply with Special Provision 274 in Column 6 of the IMDG Dangerous Goods List, you must include the technical name when marking the proper shipping name on bulk packagings. Use of the IMDG Code for transportation through the United States when part of the movement of the hazardous material is by vessel is authorized under § 171.12(b).

I hope this answers your inquiry.

Sincerely,

John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards



040039

§ 171.12(b)
§ 172.302

ExxonMobil Chemical Company
Intermediates, Synthetics Product Stewardship
P.O. Box 3140
Edison, New Jersey 08818
732 321 6033 Telephone
732 321 6057 Facsimile

Boothe
§ 171.12
§ 172.302
Marking

ExxonMobil
Chemical

04-0039

March 1, 2004

U.S. Department of Transportation
Research and Special Programs Administration
Attn: Office of Hazardous Materials Standards
DHM-10
400 7th Street, SW
Washington, DC 20590-0001

Dear Sir or Madam:

Question.

Is the technical name required as part of the marking on bulk packagings?

Comments

After review of the marking requirements at §172.302, §172.326(a) for Portable tanks, §172.328 & special provision B85 for cargo tanks, and §172.330 for rail tank cars, I find no requirement for marking the technical name on bulk packaging.

Is that an accurate understanding of the marking requirements?

I also take note in a letter of interpretation dated April 16, 1996 where the technical name was shown in conjunction with a question concerning marking of a portable tank, but the application of the technical name was not specifically addressed in that response.

Please note this question has come up most often regarding portable tanks in intermodal movement (highway to water or rail to water). In these movements the technical name has been applied, as part of the marking, pursuant to the allowance and requirement in §171.12(b) and special provision 274 of the IMDG Code respectfully.

I may be reached at the address shown above or by telephone at (732) 321-6046 or by email at ron.j.stokes@exxonmobil.com

Thanking you in advance for your help in this matter.

Sincerely,


Ronald J. Stokes